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August 29, 2022

VIA ECF

Honorable Marcia M. Henry
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Kellner v. City of New York, et al.
Docket No. 17-cv-01268 (MKB) (MMH)**

Dear Judge Henry:

I represent Plaintiff in the above matter and submit this letter, pursuant to Order of the Court, requesting so-ordered subpoenas addressed to John Lonuzzi and Moshe Friedman, respectively. Counsel have conferred and the next dates on which we are both available are September 30, 2022, and October 13, 2022 (following the conference scheduled with the Court at 9 a.m.). Also, to the extent that Mr. Lonuzzi produces documents in response to the subpoena addressed to him, the parties wish to advise the Court that they may implicate Civil Rights Law § 50-b and will be encompassed accordingly by the Court's Order.

We would be greatly obliged if the Court would thus so-order the enclosed subpoenas.

Respectfully,

Niall MacGiollabhuí
Niall MacGiollabhuí

Encls.

cc: Susan P. Scharfstein, Esq.